

# EXHIBIT 6

April 17, 2025

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1 SUPERIOR COURT FOR THE STATE OF CALIFORNIA  
2 COUNTY OF SAN FRANCISCO

3 )  
4 IN RE UBER RIDESHARE CASES ) No. CJC-21-005188  
5 )

6  
7 -AND-  
8

9 IN THE UNITED STATES DISTRICT COURT  
10 NORTHERN DISTRICT OF CALIFORNIA  
11 SAN FRANCISCO DIVISION

12 IN RE: UBER TECHNOLOGIES, INC., )  
13 PASSENGER SEXUAL ASSAULT ) No. 3:23-md-03084-CRB  
14 LITIGATION )

15  
16 HIGHLY CONFIDENTIAL PROCEEDINGS

17 PURSUANT TO PROTECTIVE ORDER

18 VALERIE SHUPING - VOLUME 1  
19 April 17, 2025  
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1           Q.       The subject line is, Adjudication  
2 process for sexual misconduct - inappropriate  
3 comments.

4                   Do you see that?

5           A.       Yes.

6           Q.       All right. And if I can direct you to  
7 the second page of the document where your email  
8 starts on Tuesday, February 13th.

9                   Do you see that?

10          A.       Where it starts, yes.

11          Q.       It's on the second page?

12          A.       Oh, okay. Sure.

13          Q.       You write, Hi, Matt and Avi. I've  
14 spoken to you both about this separately, but I'd  
15 like to revisit our current practice of running a  
16 three-strike process for sexual misconduct,  
17 inappropriate comments, non-explicit, and a  
18 two-strike process for sexual misconduct,  
19 inappropriate comments, explicit, in parallel with  
20 our unified IPC standard.

21                   Do you see that?

22          A.       Yes.

23          Q.       All right. What is the three-strike  
24 process for sexual misconduct, inappropriate

1 comments?

2 A. This is referring to an older taxonomy,  
3 and we would kind of identify sexual misconduct  
4 under the comments as explicit versus  
5 non-explicit. And at the time, we had a  
6 three-strike policy for sexual misconduct,  
7 inappropriate comments, non-explicit, and two  
8 strikes for explicit. And that means how many  
9 incidents before deactivation.

10 Q. So a three-strike or a two-strike  
11 process refers to how many reports of that type of  
12 incident would need to happen before a driver is  
13 deactivated?

14 A. That's right.

15 Q. Okay. Avi replies to you and he says,  
16 Hi, Valerie. Thanks for summarizing this. This  
17 is the first time I'm hearing of these two  
18 policies.

19 Do you see that?

20 A. Yes.

21 Q. At this point in time -- I just want to  
22 clarify the timeline. You said that this referred  
23 to an older taxonomy.

24 And are you saying that as of 2018,

1 that the three strikes was an older taxonomy, or  
2 as of today, it's an older taxonomy?

3 A. I meant as of today.

4 Q. Okay.

5 A. This was the taxonomy, I think, at the  
6 time.

7 Q. Okay. And then Matt Baker replies and  
8 says, These sexual misconduct deactivations have  
9 always been run outside of DACT and were never  
10 moved over to that system.

11 So is DACT referring to deactivation?

12 MS. PHILLIPS: Object to form.

13 Go ahead.

14 THE WITNESS: DACT -- we called it DACT  
15 for short -- is the program that we had where  
16 deactivations would be automatically flagged.

17 So Avi was the global owner of  
18 that kind of internal product at the time,  
19 and so the conversation here is talking about  
20 whether these two policies are included  
21 within that system or managed outside of it.

22 BY MS. CUTTER:

23 Q. Why were sexual misconduct  
24 deactivations run outside of that program?

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1     STATE OF ILLINOIS     )  
2                                     )   SS:  
3     COUNTY OF C O O K     )

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5  
6                     I, Michelle A. Duzan, CSR No.  
7     084-004270, a Notary Public within and for the  
8     County of Cook, State of Illinois, and a Certified  
9     Shorthand Reporter of said state, do hereby  
10    certify:

11                    That previous to the commencement of  
12    the examination of the witness, the witness was  
13    duly sworn to testify the whole truth concerning  
14    the matters herein;

15                    That the foregoing deposition  
16    transcript was reported stenographically by me, was  
17    thereafter reduced to typewriting under my personal  
18    direction and constitutes a true record of the  
19    testimony given and the proceedings had;

20                    That the said deposition was taken  
21    before me at the time and place specified;

22                    That I am not a relative or employee or  
23    attorney or counsel, nor a relative or employee of  
24    such attorney or counsel for any of the parties

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1 hereto, nor interested directly or indirectly in  
2 the outcome of this action.

3 IN WITNESS WHEREOF, I do hereunto set  
4 my hand and affix my seal of office at Orland Park,  
5 Illinois, this 21st day of April, 2025.

6  
7  
8   
9

10 Notary Public, Cook County, Illinois.

11 My commission expires 11/01/27.

12  
13 Michelle A. Duzan, CSR, RMR, CRR

14 CSR No. 084-004270  
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